



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

AUG 19 2015

REPLY TO THE ATTENTION OF:

CERTIFIED MAIL 7009 1680 0000 7648 7559
RETURN RECEIPT REQUESTED

Ms. Pamela Harvey
RS Used Oil Services, Inc.
25903 South Ridgeland Avenue
Monee, Illinois 60449

Re: Request for Information
RS Used Oil Services, Inc.
EPA I.D.: ILR 000 103 184

Dear Ms. Harvey:

The U.S. Environmental Protection Agency requests information under Section 3007 of RCRA, as amended, 42 U.S.C. § 6927. Section 3007 of RCRA authorizes the Administrator of EPA to require RS Used Oil Services, Inc. ("RS Used Oil," "you" or "facility") to submit certain information related to compliance with RCRA, 42 U.S.C. § 6901, et seq., and the regulations set forth at 40 CFR §§ 260 through 268, 273 and 279. The EPA is requiring this information to evaluate RS Used Oil's compliance with RCRA at its facility located at 25903 South Ridgeland Avenue, Monee, Illinois ("Monee Facility").

The enclosure specifies the information RS Used Oil must submit. You must submit this information within **THIRTY (30) CALENDAR DAYS** of receiving this request to the EPA, at the following address:

**Graciela Scambiaterra
Compliance Section 1
RCRA Branch
Land and Chemicals Division
77 West Jackson Boulevard, LR-8J
Chicago, Illinois 60604**

The information must be provided notwithstanding its possible characterization as confidential information or trade secrets. RS Used Oil may, under 40 CFR Part 2, Subpart B, assert a business confidentiality claim covering all or part of the information in the manner described in 40 CFR § 2.203(b). We will disclose the information covered by a business confidentiality claim only to the extent and by means of the procedures at 40 CFR Part 2, Subpart B. RS Used Oil must make

any request for confidentiality when you submit the information, since any information not so identified may be made available to the public without further notice.

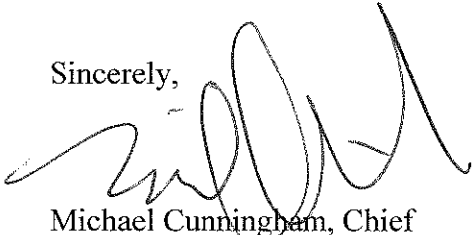
RS Used Oil must submit all requested information under an authorized signature certifying that the information is true and complete to the best of the signatory's knowledge and belief. Should the signatory find, at any time after submitting the requested information, that any portion of the submitted information is false, misleading or incomplete, the signatory should notify us. Knowingly providing false information, in response to this request, may be actionable under 18 U.S.C. §§ 1001 and 1341. We may use the requested information in an administrative, civil or criminal action.

This request is not subject to the Paperwork Reduction Act, 44 U.S.C. §§ 3501 *et seq.*, because it seeks collection of information from specific individuals or entities as part of an administrative action or investigation.

Failure to comply fully with this request for information may subject RS Used Oil to an enforcement action under Section 3008 of RCRA, 42 U.S.C. § 6928.

You should direct questions about this request for information to Graciela Scambiatterra, at (312) 353-5103, of my staff. However, if you have any legal questions, please telephone Rich Clarizio, Office of Regional Counsel, at (312) 886-0559.

Sincerely,

A handwritten signature in black ink, appearing to read 'Michael Cunningham', is written over the word 'Sincerely,'.

Michael Cunningham, Chief
Compliance Section 1
RCRA Branch

Enclosures

cc: Todd Marvel, Illinois Environmental Protection Agency (todd.marvel@illinois.gov)

REQUEST FOR INFORMATION

Instructions: RS Used Oil must respond separately to each of the questions or requests in this attachment. Precede each answer with the number of the Request to which it corresponds. For each document produced in response to this Request for Information, indicate on the document, or in some other reasonable manner, the number of the question to which it responds.

If information not known or not available to RS Used Oil as of the date of submission of its response should later become known or available to RS Used Oil, then RS Used Oil must supplement its response to the EPA. Moreover, should RS Used Oil find at any time after submitting its response that any portion of the submitted information is false, misleading, or misrepresents the truth, RS Used Oil must notify the EPA as soon as possible.

All terms used in this request for information shall have their ordinary meaning unless such terms are defined in the RCRA, 42 U.S.C. §§ 6901 et seq. and its implementing regulations.

Requests:

1. Identify all persons consulted in preparing the answers to this Request for Information. Provide the full name and title for each person identified, name of the individual's employer, and business telephone number for each individual identified.
2. Provide any documents relied upon in preparing the answers to this Request for Information.
3. Provide the full name of the current owners and operators of RS Used Oil.
 - a) If there's been a sale or transfer of the business or assets within the past five years, provide the sale or transfer documents and answer the questions below.
 - b) What does the asset purchase agreement cover?
 - c) What assets were sold and to whom?
 - d) What assets were retained?
4. Provide hazardous waste generator training records, in accordance with 35 I.A.C. 725.16 [40 CFR 265.16], for calendar years 2011, 2012, 2013 and 2014.
5. Describe how facility employees are trained on hazardous waste management and provide supporting documents for the years 2011, 2012, 2013 and 2014.
6. Provide all hazardous waste manifests for hazardous waste generated and sent off-site during calendar years 2011, 2012, 2013, 2014 and 2015. Provide the following information:
 - a) Where was this hazardous waste stored on-site (provide a map)?

- b) Describe how this generated hazardous waste was managed while on-site.
 - c) Provide the names of the customers whose used oil is associated with these hazardous waste shipments.
- 7. Provide Annual and Biennial Hazardous Waste reports for calendar years 2011, 2012, 2013 and 2014.
- 8. Provide copies of all inspection logs for the less than 90-day storage areas for the years 2011, 2012, 2013, 2014 and 2015. Identify the location of these storage areas on a map.
- 9. Provide the driver inbound logs for calendar years 2011 to present.
- 10. Identify all incoming shipments of used oil that contained greater than 1,000 parts per million ($>1,000$ ppm) of total halogens for years 2011, 2012, 2013 and 2014. Provide the information separately for each year.
 - a. Identify where each shipment was stored at the facility. Indicate the location on a map.
 - b. For all shipments that contained $>1,000$ ppm of total halogens and were off-loaded into any tanks at the facility, identify the tank number that each shipment went into, and the location of the tanks on a map.
 - c. Provide documentation related to the rebuttable presumption for each and every shipment that was identified as containing $>1,000$ ppm of total halogens that was off-loaded into any of the tanks at the facility.
- 11. Provide a list of your customers and the volume of used oil each customer sent to your facility during calendar years 2011, 2012, 2013 and 2014.
- 12. Provide a detailed explanation, or explanations, of the process or processes your facility used for the handling of used oil received at your facility from start to finish since January 2010, including, but not limited to, used oil collection, chemical composition determinations, the in-bound process, any sampling and analytical testing, procedures for compliance with used oil management regulations for used oil mixed with hazardous waste, who is responsible for these determinations, on-site storage and treatment and ultimate disposition for:
 - A. Industrial customers
 - B. Fleet service centers
- 13. Provide a description of the pre-qualification process, or processes, your facility used since January 2010 for the used oil received at your facility from:

- A. Industrial customers
- B. Fleet service centers

14. Identify the areas where tanker trucks are parked when waiting for a hazardous waste determination and provide construction information, including diagrams, on the construction of the base floor and any berms. Provide a map and pictures of these areas.
15. Identify all environmental permits issued to the facility from 2011 to the present.
16. Provide copies of each version of the Spill Prevention, Contingency and Countermeasures (SPCC) plan that existed between January 2010 and August 2015.
17. Provide copies of each version of the facility's Hazardous Waste Contingency Plan that existed between the years 2011 to 2015.
18. Provide the following certification by a responsible corporate officer:

I certify under the penalty of law that I have examined and am familiar with the information submitted in responding to this information request for production of information and documents. Based on my review of all relevant information and documents, and inquiring of those individuals immediately responsible for providing all relevant information and documents, I believe that the information submitted is true, accurate, and complete. I am aware that there are significant penalties for submitting false information, including the possibility of fine and imprisonment.

Date

Signature and Title